

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

EMELIKE NWOSUOCHA,

Plaintiff,

v.

DONALD MCKINLEY GLOVER, II, et al.

Defendants.

Case No. 1:21-cv-04047 (VM)

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE TO
ANSWER, MOVE, OR OTHERWISE
RESPOND TO THE COMPLAINT
AND ASSOCIATED BREIFING
SCHEDULE**

WHEREAS, on May 6, 2021, Plaintiff Emelike Nwosuocha filed his complaint (the “Complaint”) in the above-captioned action;

WHEREAS, in accordance with the Court’s Individual Practices, Plaintiff and Defendants (collectively, the “Parties”) engaged in pre-motion correspondence concerning a motion to dismiss that Defendants proposed filing against Plaintiff (the “Motion to Dismiss”);

WHEREAS, Plaintiff voluntarily dismissed from the action, without prejudice, Defendants RCA Records and Warner Music Group Corp.;

WHEREAS, after reviewing the parties’ pre-motion correspondence, the Court entered an Order on June 24, 2022, which permitted Defendants to file the Motion to Dismiss (subject to certain limitations and scheduling), but did not direct a deadline by which Defendants must respond to the Complaint;

WHEREAS, by subsequent memo endorsement, dated July 29, 2021, the Court “directed the Parties to submit an agreed upon joint briefing schedule for defendants’ anticipated motion to dismiss” in September 2022; and

NOW, THEREFORE, Plaintiff and Defendants, by and through their undersigned counsel, hereby agree as follows:

1. Defendants shall file the Motion to Dismiss on September 9, 2022.
2. Plaintiff's opposition to the Motion to Dismiss shall be filed on or before September 16, 2022.
3. Defendants shall file a reply, if any, on or before September 23, 2022.
4. This stipulation may be signed in counterparts, and facsimile/PDF/electronic signatures shall be deemed original signatures.

Dated: August 12, 2022
New York, New York

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IT IS SO ORDERED.

DATED: _____

Honorable Victor Marrero